

EXHIBIT C

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

Hon. Robert B. Kugler

Civil No. 1:19-md-2875-RBK-JS

**DECLARATION OF PAUL RAMSEY IN SUPPORT OF THE MANUFACTURER
DEFENDANTS' MOTION TO MODIFY ESI SEARCH TERMS**

Pursuant to 28 U.S.C. § 1746, I, Paul Ramsey, hereby declare as follows:

1. I am a Director within the Strategic Client Solutions division of Consilio LLC (“Consilio”).
2. Consilio is Mylan’s eDiscovery and managed review provider for this litigation.
3. Based on information obtained from Mylan’s counsel, I understand that on December 23, 2019, the Court entered an Order that (a) established the list of the individual ESI custodians for each Manufacturer Defendant; and (b) incorporated certain ESI Search Terms negotiated by and among the parties to be used to locate responsive documents contained within the Manufacturer Defendants’ custodial email files during the relevant time period (the “Original ESI Search Terms”).
4. Based on information obtained from Mylan’s counsel, I further understand that the Manufacturer Defendants, including Mylan, have jointly prepared a counterproposal containing revised ESI search terms (the “Revised ESI Search Terms”).
5. Based on information obtained from Mylan’s counsel, I further understand that Mylan has performed an initial collection of custodial Microsoft Outlook email files, and has tested that data using both the Original ESI Search Terms, and the Revised ESI Search Terms.

6. Based on the volume of data captured by the Original ESI Search Terms, Consilio estimates that Mylan would incur a cost of \$7,865,000 to process, store, and review¹ its custodial email files. It will cost approximately \$2,100,000 just to process the data in accordance with the parties' ESI Protocol.

7. In contrast, based on the volume of data captured by the Revised ESI Search Terms, Consilio estimates that Mylan would incur \$3,375,000 to process, store, and review its custodial email files.

8. These cost estimates reflect the following assumptions:

- a. De-duplication rate of fifty percent (50%);
- b. Email threading reduction rate of ten to fifteen percent (10-15%);
- c. Non-responsive analysis reduction of ten percent (10%); and
- d. Review of 300 documents per day per contact review attorney.

9. The foregoing assumptions are based upon industry norms, with a weighted bias based on Mylan's typical data behavior.

10. These estimates reflect only Consilio's anticipated costs. They do not include fees expected to be incurred related to outside counsel's secondary and tertiary review and production of Mylan's custodial email files.

11. These Cost estimates will increase exponentially to the extent that the size of the data collection also increases.

Dated: May 27, 2020

Respectfully submitted,

Paul Ramsey
/s/ Paul Ramsey (May 27, 2020 12:46 CDT)

¹ I understand that the use of Technology Assisted Review ("TAR") to limit the review of non-responsive documents may be further discussed by the parties.